From: GAINER Tom
To: Eric Blischke/R10/USEPA/US@EPA
Subject: RE: Draft Comments on Section 10 of Round 2 Report and Portland Harbor FS Guidance
Date: 03/11/2008 05:13 PM

Hi Eric-
Is the time/place known for tomorrow's Tech meeting on background?

Thanks-
Tom

-----Original Message-----
From: Blischke.Eric@epamail.epa.gov
[mailto:Blischke.Eric@epamail.epa.gov]
Sent: Tuesday, March 11, 2008 5:08 PM
To: Shephard.Burt@epamail.epa.gov
Cc: ANDERSON Jim M; audiehuber@ctuir.com; BBarquin@hk-law.com; Benjamin Shorr; Bob Dexter; Humphrey.Chip@epamail.epa.gov; csmith@parametrix.com; cunninghame@gorge.net; dallen@stratusconsulting.com; Davoli.Dana@epamail.epa.gov; FARRER David G; Yamamoto.Deb@epamail.epa.gov; erin.madden@gmail.com; GAINER Tom; Grepo-Grove.Gina@epamail.epa.gov; howp@critfc.org; jay.field@noaa.gov; jeremy_buck@fws.gov; Goulet.Joe@epamail.epa.gov; jpeers@stratusconsulting.com; Smith.Judy@epamail.epa.gov; Koch.Kristine@epamail.epa.gov; LavelleJM@cdm.com; Lisa.Bluelake@grandronde.org; Cora.Lori@epamail.epa.gov; Ader.Mark@epamail.epa.gov; Mary.Baker@noaa.gov; MCCLINCY Matt; Michael.Karnosh@grandronde.org; PETERSON Jenn L; POULSEN Mike; Fuentes.Rene@epamail.epa.gov; rgensemer@parametrix.com; Robert.Neely@noaa.gov; rose@yakama.com; Sheldrake.Sean@epamail.epa.gov; sheila@ridolfi.com; tomd@ctsi.nsn.us; (b) (6)
Subject: Re: Draft Comments on Section 10 of Round 2 Report and Portland Harbor FS Guidance

Not thinking we need PRGs for tissue. The RAOs discuss reducing sediment concentrations to that will result in acceptable levels in fish tissue. I agree - we are remediating sediment.

Regarding the second point - I also agree. Note that the PRG comments are somewhat inconsistent. I do want to allow using the RM 15 data to identify those pathways and risk levels for which we need to set water levels to zero and allow for probabilistic approaches. This concept appears three places and I only changed it in one.

Eric

Burt Shephard/R10/USEPA/US
03/11/2008 04:08 PM

To: Eric Blischke/R10/USEPA/US@EPA
cc: anderson.jim@deq.state.or.us, audiehuber@ctuir.com, BBarquin@hk-law.com, Benjamin Shorr <Benjamin.Shorr@noaa.gov>, Bob Dexter <bob@ridolfi.com>, Chip Humphrey/R10/USEPA/US@EPA, csmith@parametrix.com, cunninghame@gorge.net, dallen@stratusconsulting.com, Dana Davoli/R10/USEPA/US@EPA, David.G.Farrer@state.or.us, Deb Yamamoto/R10/USEPA/US@EPA, erin.madden@gmail.com, GAINER Tom <GAINER.Tom@deq.state.or.us>, Gina Grepo-Grove/R10/USEPA/US@EPA, howp@critfc.org, jay.field@noaa.gov, jeremy_buck@fws.gov, Joe Goulet/R10/USEPA/US@EPA, jpeers@stratusconsulting.com, Judy Smith/R10/USEPA/US@EPA, Kristine Koch/R10/USEPA/US@EPA, LavelleJM@cdm.com, Lisa.Bluelake@grandronde.org, Lori Cora/R10/USEPA/US@EPA, Mark Ader/R10/USEPA/US@EPA, Mary.Baker@noaa.gov, MCCLINCY Matt <MCCLINCY.Matt@deq.state.or.us>, Michael.Karnosh@grandronde.org, Jennifer L Peterson <PETERSON.Jenn@deq.state.or.us>, POULSEN Mike <POULSEN.Mike@deq.state.or.us>, Rene Fuentes/R10/USEPA/US@EPA, rgensemer@parametrix.com, Robert.Neely@noaa.gov, rose@yakama.com, Sean Sheldrake/R10/USEPA/US@EPA, sheila@ridolfi.com, (b) (6)
Subject

Re: Draft Comments on Section 10 of Round 2 Report and Portland Harbor FS Guidance(Document link: Eric Blischke)

Eric,

One question for discussion on the draft Section 10 comments. Do we want (or need) PRGs for any type of tissue, or do we only need them for sediment and water?

We don't dredge, cap or otherwise remediate biota per se, thus why would biota have a remedial goal? We can certainly use acceptable human health or ecological tissue risk based concentrations of chemicals of concern as the point of departure for deriving sediment or water PRGs, but aren't the remedial goals really intended to be applied to media concentrations? Will any sort of tissue monitoring be part of post-remedial monitoring at the site, necessitating a tissue goal to measure compliance? Maybe this is nothing more than semantics, using PRG as another name for a risk based goal. Any thoughts?

Another thought on the comments after talking with Dana. I understand the rationale for running the food web model with water concentrations set to zero, and sediment concentrations set to zero (but make sure we don't propose doing both at the same time, because that would predict zero chemical in the tissues being modeled). In addition to running the FWM this way, wouldn't it make some sense to run the FWM at regional background for chemicals in sediment and water, assuming we can agree how to define that? That ultimately is the best case we could hope for from sediment and water.

Best regards,

Burt Shephard
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"If your experiment needs statistics to analyze the results, then you ought to have done a better experiment"
- Ernest Rutherford

Eric Blischke/R10/USEPA/US
03/10/2008 05:53 PM

To: Burt Shephard/R10/USEPA/US@EPA, Chip Humphrey/R10/USEPA/US@EPA, Dana Davoli/R10/USEPA/US@EPA, GAINER Tom <GAINER.Tom@deq.state.or.us>, Gina Grepo-Grove/R10/USEPA/US@EPA, Jennifer L Peterson <PETERSON.Jenn@deq.state.or.us>, jeremy_buck@fws.gov, anderson.jim@deq.state.or.us, Joe Goulet/R10/USEPA/US@EPA, Judy Smith/R10/USEPA/US@EPA, Kristine Koch/R10/USEPA/US@EPA, MCCLINCY Matt <MCCLINCY.Matt@deq.state.or.us>, howp@critfc.org, POULSEN Mike <POULSEN.Mike@deq.state.or.us>, Rene Fuentes/R10/USEPA/US@EPA, Robert.Neely@noaa.gov, Sean Sheldrake/R10/USEPA/US@EPA, tomd@ctsi.nsn.us, csmith@parametrix.com, rgensemer@parametrix.com, rose@yakama.com, erin.madden@gmail.com, jay.field@noaa.gov, Lori Cora/R10/USEPA/US, Mark Ader/R10/USEPA/US@EPA, BBarquin@hk-law.com, audiehuber@ctuir.com, Lisa.Bluelake@grandronde.org, sheila@ridolfi.com, Benjamin Shorr <Benjamin.Shorr@noaa.gov>, LavelleJM@cdm.com, Mary.Baker@noaa.gov, Michael.Karnosh@grandronde.org, David.G.Farrer@state.or.us, dallen@stratusconsulting.com,

(b) (6) lting.com, Bob Dexter <bob@ridolfi.com>, cunninghame@gorge.net

cc

Deb Yamamoto/R10/USEPA/US

Subject

Draft Comments on Section 10 of Round 2 Report and Portland Harbor FS Guidance

Attached are EPA's draft comments on Section 10 of the Round 2 Report. This section addresses the development of PRGs and AOPCs. At this point, we are proposing the following process for PRGs and AOPCs:

- Initial PRGs based on a screening level risk assessment should not be developed or presented in the draft RI Report.
- Preliminary remediation goals should be developed based on the results of the BRA and the identification of chemical specific ARARs. BSAFs and the results of the foodweb model should be used as appropriate for development of PRGs. PRGs should be developed only for COCs identified based on the results of the BRA.
- PRGs should not take into account the area over which exposure may occur or the use of techniques such as hilltopping. Rather, PRGs are simply protective sediment or water concentrations. PRGs should be presented in the refined remedial action objectives technical memorandum (Refined RAO TM).
- In areas where the EPC exceeds the PRG, AOPCs should be developed based on application of the PRG. Geo-statistical techniques such as inverse distance weighting, Thiessen polygons and/or krieging should be used to identify areas where PRGs are exceeded. Site specific factors such as the spatial distribution of contamination and exposure areas at the site should be evaluated to select the appropriate geo-statistical technique. AOPCs should be presented in the Refined RAO TM.
- PRGs and AOPCs should be refined into remediation goals (RGs) and sediment management areas (SMAs) in the feasibility study. RGs and SMAs should be established by estimating the concentration above which sediments must be removed to reduce the EPC down to the acceptable level. Hilltopping or other similar approaches may be used for this analysis.

Regarding the Portland Harbor FS Guidance, we have developed an approach that emphasizes the development and screening of remedial action alternatives. The goal of the screening step is to develop a range of alternatives for each SMA that can be assembled into a limited set of site wide remedial action alternatives that will go through the detailed evaluation of remedial action alternatives in the Portland Harbor FS.

Please review these documents. I plan to go over them at this week's TCT.

Thanks, Eric

[attachment "FSGuidance0301008.doc" deleted by Burt Shephard/R10/USEPA/US] [attachment "Section10Comments031008.doc" deleted by Burt Shephard/R10/USEPA/US]